

**RESPONSE TO COMMENTS**  
**TRIDENT SEAFOODS CORPORATION (TRIDENT)**  
**ST. PAUL SEAFOOD PROCESSING PLANT**  
**MINOR PERMIT NO. AQ0230MSS01, TITLE I PERMIT REVISION**  
**PROJECT X-256**  
**Final –August 10, 2005**

Trident requested a minor permit to revise an existing Title I permit revision at the St. Paul Seafood Processing Plant, St. Paul Island, Alaska. The Alaska Department of Environmental Conservation (ADEC) prepared a proposed permit and accepted public comment on the permit from June 29, 2005 through July 29, 2005.

ADEC received comments on the construction permit from Ms. Jeanette Brena, on behalf of ADEC's Title V Permitting Group, by email on July 5, 2005; and Mr. Earl Hubbard, Trident Seafood Corporation, by email on July 29, 2005.

This document contains ADEC's responses (shown in ***bold italics***) to comments on the proposed permit.

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**COMMENTS ON MINOR PERMIT NO. AQ0230MSS01**

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**A. Jeanette Brena's comments**

1. Please update the notification form to the newest – which is sent to the Fairbanks office – use emission unit rather than source, etc. See a final renewal permit on the web for the updates.

***Response – Permit revised.***

2. Other small edits – conditions 11 and 16 need links (has several condition 0) – and also a few typos.

***Response – Permit revised.***

**B. Earl Hubbard's comments**

There are numerous typographic errors in the draft minor permit. These are indicated in the redline/strikeout version of the draft permit that accompanies these comments (an electronic version of the redline/strikeout draft permit is being emailed to ADEC).

***Response – ADEC has corrected the typos.***

Location                      The location on page 1 of the permit contains typographic errors. It should state:

UTM Zone 2, Northing: 6,334.488 km; Easting: 541.947 **km**  
Latitude: **57**°09'18" North; Longitude: 170°18'23" West

***Response – Permit revised.***

Table 1                      The description for Emission Unit 1 should be:

Caterpillar Generator D-3512A

***Response – Permit revised.***

Condition 2                      In addition to diesel and fish oil fuels, the fuels authorized for the boilers (Emission Units 6 and 7) should include used oil. Construction and Operating Permit No. 230TVP01 allowed burning of used oil in the boilers, and this should be carried forward into the minor permit.

The issue of construction permits expiring and the problems potentially created by issuing joint “construction and operating” permits has been raised with ADEC before. ADEC made a material mistake by issuing a joint permit; these permits should have been issued separately, with the Title V permit expiring within 5 years of issuance. Since Permit No. 230TVP01 is a “Construction and Operating” permit, the “construction permit” aspects of the permit must remain valid because construction permits do not expire. According to 18 AAC 50.301a, Permit Continuity, an air quality permit that is effective under this 18 AAC 50 as of October 1, 2004, remains in effect until it: 1) expires, consistent with AS 46.14.230 (this applies only to operating permits, not construction permits); 2) is revoked by the ADEC under AS 46.14.280 (this applies only if there is just cause, which is not the case for the St. Paul Plant); or 3) is replaced by a permit issued under 18 AAC 50. The fact that a construction permit does not expire was confirmed by ADEC in its May 11, 2004, letter to Trident regarding the Akutan Seafood Processing Facility (Trident Akutan). ADEC incorrectly placed an expiration date on a Trident Akutan’s construction permit. This letter corrects the error and explains that the expiration date was subsequently removed from the permit because it “had no regulatory basis.” Likewise, because the St. Paul Plant’s Permit No. 230TVP01 is indeed a “construction permit,” the construction permit terms cannot expire.

ADEC attempted to rationalize its decision to put an expiration date on St. Paul’s Permit No. 230TVP01, after the fact, by claiming that this is frequently done for exploratory well construction permits. However, exploratory well permits are designed for temporary operations, unlike those of the St. Paul Plant and other stationary source in Alaska.

***Response – Construction/Operating Permit 220TVP01 expired on March 31, 2005, as described under “Permit History” in the Technical Analysis Report.***

***However, the issue of whether or not the construction/operating permit expires or not does not expire is moot regarding Tridents desire to burn used oil. The department’s concern (now and***

Condition 5 Since the stack heights have already been modified, there is no need for Condition 5 to remain in the minor permit. Therefore, please delete Condition 5.

Condition 6.1 This condition is only applicable if the fuel sulfur content exceeds 0.24 percent by weight. As it is written in the draft minor permit, it could be misconstrued that it applies even if the sulfur content were 0.24 percent or less. Therefore, please revise this condition as follows:

*Response – Permit revised.*

- a. from Units 1 and 2 combined to no more than 45 tons per 12 consecutive months;
- b. from Units 1 through 5 combined to no more than 57.6 tons per 12 consecutive months; and

Condition 7.2b(iii) Equation 7 has the incorrect subscripts; they should be “6-7” instead of “1-5.” In addition, since the boilers may also burn other fuels besides distillate fuel, please revise Equation 7 as follows:

Where:  $NO_X$  = NO<sub>x</sub> emissions in tons per month;  
and  
 $Fuel_{6\&7}$  = **Fuel consumption** in gallons per month for Units 6  
and 7 (condition 7.2a)

***Response – Permit revised.***

Condition 9.2                      Conditions 9.2a and 9.2b incorrectly refer to “pounds.” The correct reference is “gallons.” Therefore, please revise Conditions 9.2a and 9.2b as follows:

- a.        Before loading fuel into a storage tank, measure and record the quantity of fuel in the storage tank before shipment, in **gallons** ( $V_T$ ).
- b.        Record the amount of fuel in the shipment, in **gallons** ( $V_S$ ).

***Response – The permit required weight in pounds because the fuel sulfur is weight percent sulfur. However, the department finds that the Permittee can adequately show compliance with fuel sulfur requirements if they assume a constant fuel density. Since density then drops out of the calculations, the Permittee may measure volume in gallons, as requested. Permit revised.***

Condition 9.4                      Condition 9.4 incorrectly refers to “pounds.” The correct reference is “gallons.” Therefore, please revise this condition as follows:

- 9.4        Include in the report required by condition 17, a list of the sulfur content and quantity in **gallons** of each shipment of fuel delivered to the stationary source during the reporting period, and a copy of calculations required by condition 9.2c.

***Response – Permit revised. See response to comment on condition 9.2.***

Conditions 11.2-11.4        These conditions refer to nonexistent Condition “0.” Please revise these conditions to reference Condition 11.

***Response – Permit revised.***

Condition 16.1                      This condition refers to nonexistent Condition “0.” Please revise this condition to reference Condition 11 (“Air Pollution Prohibited”).

***Response – Permit revised.***

Condition 17                      According to 18 AAC 50.544(c)(1)(E), making periodic reports on process operations and emissions is only required for minor permits issued under 18 AAC 50.502(c). Trident is applying for a minor permit under 18 AAC 50.508(6), so the requirement for a facility operating report does not apply to the St. Paul Plant. Nevertheless, Trident recognizes ADEC’s concern that sufficient reporting requirements may be necessary to ensure compliance with applicable requirements. Since a minor permit is designed to have less onerous requirements than a Title V permit, and since the emissions from the St. Paul Plant are well

below the Title V permit threshold of 100 tpy, submitting annual operating reports is sufficient for this minor permit and consistent with 18 AAC 50.544(a)(4) regarding the content of minor permits. Therefore, please revise this condition as follows:

Operating Reports. The permittee shall submit to the department one original and one copy of an operating report by February 1 for the period January 1 to December 31 of the previous year.

***Response – Because (1) Trident is required to calculate 12 month total emissions on a monthly basis; (2) if they exceed a limit they are required to report as excess emissions within 30 days of the end of the month in which the emissions or deviation occurs; and (3) the highest expected emissions (NO<sub>x</sub>) are capped at 60 tpy (well below the 100 tpy title V permitting threshold), the department finds that annual reporting is adequate to ensure compliance with the limit. Permit revised.***

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**COMMENTS ON TECHNICAL ANALYSIS REPORT for MINOR PERMIT NO.  
AQ0230MSS01**

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1. See specific comments and edits in the redline/strikeout version of the Technical Analysis Report (TAR). An electronic version of the redline/strikeout draft permit is being emailed to ADEC.

***Response – These recommended changes are either non-substantive or are already addressed in the comments above. The department has made changes as appropriate.***

2. Since 50.502(c) is not applicable to the minor permit for the St. Paul Plant, and the minor permit is not being issued under 50.502(c), please delete Section 2.3 from the TAR.

***Response – TAR revised.***